

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
SOUTHERN DIVISION

In the Matter of the Search of

No. 4:21-mj-87


21-097-04

**REDACTED APPLICATION FOR
SEARCH AND SEIZURE WARRANT**

I am a Special Agent with the United States Department of Justice, Drug Enforcement Administration (DEA), and have reason to believe that within the records fully described in Attachment A, attached hereto and incorporated herein by reference, there is now concealed certain property, namely: that fully described in Attachment B, attached hereto and incorporated herein by reference, which I believe is property constituting evidence of the commission of criminal offenses, contraband, the fruits of crime, or things otherwise criminally possessed, or property designed or intended for use or which is or has been used as the means of committing criminal offenses

[REDACTED]
[REDACTED] (Subject Offenses).

The facts to support a finding of Probable Cause are contained in my Affidavit filed herewith.



Brandon Purcell, Special Agent
Drug Enforcement Administration

Subscribed to and sworn before me, telephonically, on the 15th day of June, 2021.



VERONICA L. DUFFY
UNITED STATES MAGISTRATE JUDGE

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
SOUTHERN DIVISION

In the Matter of the Search of

21-097-04

No. 4:21-mj-87

**REDACTED SEARCH AND
SEIZURE WARRANT**

TO: ANY AUTHORIZED LAW ENFORCEMENT OFFICER

An application by a federal law enforcement officer or an attorney for the government requests the search of the person and property described in Attachment A, attached hereto and incorporated herein by reference.

I find that the affidavit, or any recorded testimony, establish probable cause to search and seize the property described above for the information fully described in Attachment B, attached hereto and incorporated herein by reference, and that such search will reveal evidence of the violations [REDACTED].

YOU ARE COMMANDED to execute this warrant on or before
6-29-2021 (not to exceed 14 days)
☒ in the daytime - 6:00 a.m. to 10:00 p.m.
☐ at any time in the day or night as I find reasonable cause has been established.

Unless delayed notice is authorized below, you must give a copy of the warrant and a receipt for the property taken to the person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the place where the property was taken.

The officer executing this warrant, or an officer present during the execution of the warrant, must prepare an inventory as required by law and promptly return this warrant and inventory to the undersigned Judge.

- ☐ Pursuant to 18 U.S.C. § 3103a(b), I find that immediate notification may have an adverse result listed in 18 U.S.C. § 2705 (except for delay of trial), and authorize the officer executing this warrant to delay notice to the person who, or whose property, will be searched or seized,
☐ for _____ days (not to exceed 30).
☐ until, the facts justifying, the later specific date of _____.

6-15-21 at 4:46 pm CDT
Date and Time Issued Telephonically at Sioux Falls, South Dakota


VERONICA L. DUFFY
United States Magistrate Judge

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
SOUTHERN DIVISION

In the Matter of the Search Regarding

No. 4:21-mj-87

21-097-04

REDACTED RETURN

Date and time warrant executed:

Copy of warrant and inventory left with: _____

Inventory made in the presence of: _____

Inventory of the property taken and name of any person(s) seized (attach additional sheets, if necessary):

<p style="text-align: center;">CERTIFICATION</p> <p>I declare under penalty of perjury that this inventory is correct and was returned along with the original warrant to the designated judge.</p> <p style="text-align: right;">_____ Brandon Purcell, Special Agent Drug Enforcement Administration</p>

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
SOUTHERN DIVISION

In the Matter of the Search of

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**REDACTED ATTACHMENTS
A AND B**

**REDACTED ATTACHMENT A
DESCRIPTION OF PROPERTY TO BE SEARCHED**

1.

[REDACTED] ; and

2.

[REDACTED] ; and

3.

[REDACTED] ; and

4.

[REDACTED] ;

[REDACTED]

REDACTED ATTACHMENT B

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
SOUTHERN DIVISION

In the Matter of the Search of
21-097-04

No. 4:21-mj-87

**REDACTED AFFIDAVIT IN
SUPPORT OF SEARCH AND
SEIZURE WARRANT**

STATE OF SOUTH DAKOTA)
 :SS
COUNTY OF MINNEAHAHA)

I, Brandon Purcell, being duly sworn on oath, depose and say:

1. I am a Special Agent with the United States Department of Justice, Drug Enforcement Administration (DEA), and have been so employed since July 2020. I am currently assigned to the DEA Sioux Falls Resident Office (SFRO) and empowered to conduct investigations of [REDACTED] [REDACTED] of the United States Code. I have received 16 weeks of specialized training in Quantico, Virginia, pertaining to drug identification and drug trafficking, undercover operations, and electronic and physical surveillance procedures. I have been a law enforcement officer for approximately 10.5 years in which I have received training for and conducted investigations related to narcotics, vice activities, homicide, economic crimes, and public corruption crimes.

2. Prior to becoming a DEA Special Agent, I was a Special Agent with the United States Department of Homeland Security/Homeland Security Investigations. Prior to that, I was a Special Agent with the Florida Department of Law Enforcement and assigned to the DEA as a Task Force Officer (TFO). I have training and experience concerning investigations of federal and state narcotics laws, and have participated in the investigation of such state and federal violations on numerous occasions. I have assisted in the preparation and execution of numerous state and federal search warrants. I have attended and completed courses of instruction relating to investigative techniques in narcotics and financial investigations. I have received training, both formal and informal, in drug trafficking and money laundering investigations. I have participated in and conducted investigations resulting in the arrests of individuals who received and distributed controlled substances, and the seizures of illegal narcotics. Further, in connection with these and other narcotics cases, I have conducted

follow-up investigations relating to the identification of co-conspirators through the use of ledgers, telephone bills, records and photographs.

3. I have participated in investigations involving the interception of wire communications, the interception of electronic communications, and the use of video surveillance. I am familiar with the manner in which narcotics traffickers and money launderers conduct their business, including, but not limited to, their methods of importing and distributing controlled substances, their use of cellular telephones, pay phones, prepaid calling cards and digital display paging devices, and their use of numerical codes and coded and/or cryptic language, words, and references to conduct their transactions.

4. As part of my duties as a DEA Special Agent, I have been involved in the debriefing of defendants, witnesses and informants, as well as others who have knowledge of the distribution and transportation of controlled substances. Further, I have participated in numerous narcotics investigations in which I have conducted or participated in physical surveillance, electronic surveillance, controlled buy/transactions, undercover operations and the execution of search warrants. Specifically, I have supported Title III investigations involving the use of electronic communications interceptions through monitoring, technical operations, surveillance and arrests.

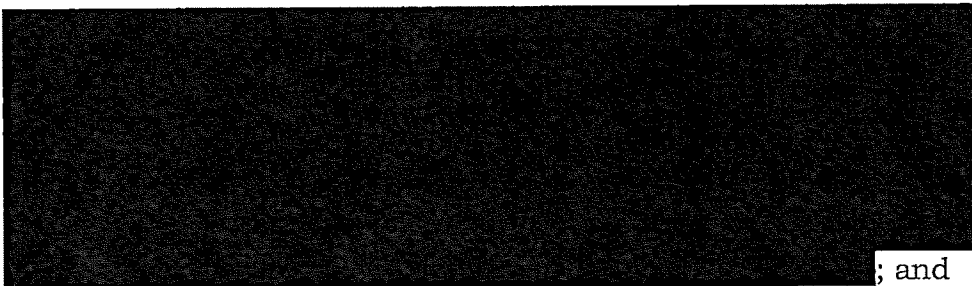

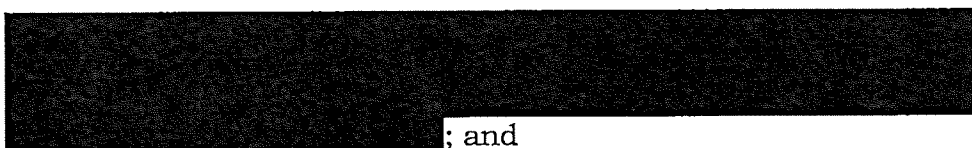


5. Based on my training, experience, and participation in investigations of state and federal narcotics violations, I am familiar with drug organizations and know that such organizations will commonly compartmentalize members in an effort to limit individual knowledge of the operations of the organization to as few persons as possible. To minimize their risk of apprehension, leaders of drug organizations commonly attempt to distance themselves from drugs and proceeds, leaving subordinates to drive vehicles and move drugs and drug proceeds from place to place. Through these investigations, my experience and training, and conversations with other law enforcement personnel, I have become familiar with the methods used by drug traffickers to smuggle and safeguard drugs, to distribute drugs, and to collect and launder drug-related funds. I am particularly familiar with methods employed by larger drug organizations and the sophisticated tactics utilized. These tactics include the use of cellular telephone technology, text messaging, counter-surveillance, elaborately planned smuggling schemes tied to legitimate businesses, false or fictitious identities, and coded communications and conversations. This knowledge has been particularly useful and relevant to this investigation.

6. Further, based on my training and experience in investigating drug trafficking offenses, I have interviewed numerous criminals regarding the transportation and sales of drugs. During many of these investigations, the criminals have admitted to their modus operandi and their utilization of telephones. Based on my experience in conducting these investigations, I have

developed skills in this area and can determine when telephonic information devices are essential to a successful investigation.

7. I know, from training and experience in the field of drug enforcement that individuals involved in crimes of possession for sale, sales, and transportation of controlled substances (including crystal methamphetamine, heroin, fentanyl and cocaine), often utilize cellular telephones and text messaging to arrange their crimes or coordinate with co-conspirators. Numerous times, drug dealers place these telephones in the names of family, friends, or fictitious names, and/or purchase unsubscribed prepaid cellular telephones to avoid detection. Another technique often used by drug traffickers to avoid detection is the use of coded conversations and vague terminology to discuss drug transactions. For example, rather than use the words "drugs," "narcotics," "cocaine," or "methamphetamine," drug dealers will use a variety of different code words. Similarly, drug traffickers will often use vague terms in order to avoid talking about specific locations, currency, and drug amounts.

8. Through this affidavit, I am requesting search warrants be issued for the following:

- ; and
- ; and
- ; and
- , SD;
- .

9. I respectfully submit this affidavit in support of an application for a warrant to search for and seize instrumentalities, fruits, and evidence of violations of [REDACTED].

10. Because this affidavit is being submitted for the limited purpose of securing a search warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only those facts that I believe are necessary to establish probable cause to believe that evidence of violations of United States Code are located at the Subject Premises mentioned in this affidavit.

11. I have received information from other law enforcement officers and sources of information by either verbal or written report. The officers and sources providing information may have received the information by way of personal knowledge or from another source.

Probable Cause

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

Training and Experience

41. Based on my training, experience, and participation in this and other criminal investigations, I know that:
- a. Those involved in illegal activities often place assets in names other than their own to conceal these assets from law enforcement officials and to launder money
 - b. Those involved in illegal activities often attempt to legitimize their profits by using financial institutions and their services. Records of these financial accounts are normally kept in their residences and/or electronic devices.
 - c. It is common for those involved in illegal activities to make currency expenditures with the proceeds from their unlawful activity.
 - d. It is common for those involved in illegal activities to use associates and/or co-conspirators to transfer/move money to avoid detection by law enforcement and/or financial institutions.
42. From my training and experience I know that it is a violation of Title 18, United States Code, Section 1956 (Money Laundering), for an individual, knowing that the property involved in a financial transaction represents the proceeds of some form of illegal activity, to conduct or attempt to conduct a financial transaction which involves the proceeds of a specified unlawful activity with the intent to carry on a specified unlawful activity or to conceal the proceeds of a specified unlawful activity.
43. Based on my training and experience I know that persons involved with the illegal sale of controlled substances use bank accounts, wire transfers, money orders, bulk cash couriers, cryptocurrency and purchase of assets to disguise the illegal proceeds and to avoid law enforcement detection.
44. Based upon my training, experience and participation in other

investigations involving cocaine, crack cocaine, MDMA, steroids, methamphetamine, heroin, fentanyl, marijuana and/or other controlled substances, I know:

- a. That narcotics traffickers often place their assets in names other than their own to avoid detection of these assets by government agencies;
- b. That even though their assets are in other persons names, the narcotics traffickers own and continue to use these assets and exercise dominion and control over them;
- c. That large-scale narcotics traffickers often maintain on hand large amounts of U.S. currency in order to maintain and finance their ongoing narcotics business;
- d. That narcotics traffickers often maintain books, records, notes, ledgers, airline tickets, money orders, and other papers relative to the transportation, ordering, sale, and distribution of controlled substances. That narcotics traffickers occasionally "front" (provide narcotics on consignment) narcotics to their clients. That the aforementioned books, records, receipts, notes, ledgers, etc., are often maintained where the narcotics traffickers have ready access to them, including in their residences and vehicles;
- e. That it is common for narcotics traffickers to secrete contraband, proceeds of drug sales, and records of drug transactions (some being coded and cryptic in nature) in secure locations within, or in near proximity to, their respective residences and/or vehicles for ready access and to conceal from law enforcement authorities;
- f. That persons involved in drug trafficking often conceal in and near their residence and vehicles caches of drugs, large amounts of currency, financial instruments, precious metals, jewelry, and other items of value and/or proceeds of drug transactions; and evidence of financial transactions related to obtaining, transferring, secreting, and/or spending of large sums of money made from engaging in narcotics trafficking activities;
- g. That controlled substance traffickers commonly maintain address or telephone books or papers which reflect names, addresses and/or telephone numbers of their associates in the trafficking organization;

- h. That narcotics traffickers often utilize electronic devices, cellular telephones, electronic address books, computers, etc., to facilitate communication with co-conspirators and/or store telephone numbers/addresses of associates, customers and sources of supply.
- i. That narcotics traffickers often possess firearms, ammunition, and other weapons.
- j. That persons present at locations where drugs are distributed, stored and/or used, often conceal many of the above mentioned items, particularly controlled substances and names/numbers of associates, on their person.

45. I know based on my training and experience that individuals who engage in the Subject Offenses often keep physical evidence, fruits, and instrumentalities of their crimes inside their residences, including, but not limited to, controlled substances, packaging material and packing inserts (from outgoing drug shipments and incoming cash deliveries), shipping labels (from outgoing drug shipments and incoming cash deliveries), ledgers reflecting drug transactions and funds laundered, drug and financial transaction reports, customer and supplier lists, identification documents and records confirming residency, access devices relating to drug supplies and financial accounts (such as swipe cards to medical offices and credit and debit cards), detailed financial records, and cash proceeds.

46. I know based on my training and experience that such evidence, fruits, and instrumentalities are often stored in locked containers, safes, secret compartments, closets, drawers, above or below ceiling and floor tiles, behind false walls, and in other places intended to avoid detection by other people, including law enforcement.

47. Based on my training and experience, I know that it is common for people involved in the sale, distribution and use of illegal drugs to keep records of their customers and suppliers. Individuals involved in the sale, distribution and use of illegal drugs will conceal their drugs and paraphernalia on themselves as well as use other people to conceal the drugs and paraphernalia. People involved in the sale, distribution and use of illegal drugs will often conceal their drugs and paraphernalia in their vehicles as they are often used to distribute drugs. Based on this training and experience I know that people involved with the sale of marijuana and other drugs will ingest marijuana and/or other drugs.

48. I know based on my training and experience that even if long time drug traffickers stop distributing controlled substances, either voluntarily, or under law enforcement pressure, these traffickers often retain in their possession many items with evidentiary value, including telephones and telephone records; names, addresses and telephone numbers of associates;

documents related to financial transactions; and other items as listed in this affidavit.

49. I know that the commission of the Subject Offenses in the manner set forth above can require the use of computers, smart phones, tablets, or other computer devices and storage media for the perpetrator to access dark web marketplaces and bitcoin exchanges, connect with customers, and co-conspirators, and engage in the transfers of digital currency. I have learned through training and experience that individuals who engage in the Subject Offenses in this way also commonly use such electronic devices to keep track of suppliers, customers and co-conspirators, keep records of illegal transactions and criminal proceeds, and store copies of online chats, emails, and other data. In addition, I know, based on training and experience that perpetrators maintain copies of software programs and other applications to assist with accessing the dark web and running a vendor account, including, but not limited to, Tor browser software, Bitcoin client and wallet files, digital signature software and related authentication keys, as well as encryption software and related encryption keys. In such cases, I know that perpetrators often keep such electronic devices inside their homes. In the case of smart phones, tablets, and laptop computers, perpetrators may also keep such devices on their person in, either in their pockets or in containers such as carrying bags, cases, backpacks or protective sleeves.

50. I know that computers and electronic storage devices may be important to a criminal investigation in two distinct ways: (1) the objects themselves may be contraband, evidence, instrumentalities, or fruits of crime, and/or (2) the objects may be used as storage devices that contain contraband, evidence, instrumentalities, or fruits of crime in the form of electronic data. In this case, the warrant application requests permission to seize electronic storage devices to include but not limited to computers and cell phones.

51. Based upon my knowledge, training and experience, I know that searching and seizing information from electronic storage devices often requires agents to seize most or all electronic storage devices (along with related peripherals) to be searched later by a qualified computer expert in a laboratory or other controlled environment.


52. I hereby request the Court's permission to seize the electronic storage devices and associated peripherals that are believed to contain some or all of the evidence described in the warrant.

53. I believe based on the above information that individuals known, and unknown have been involved in drug trafficking activities in the Sioux Falls, South Dakota area for an extended period of time. I further believe these individuals' activities are ongoing.

54. Based upon my training and experience I believe that individuals known and unknown are involved in the distribution, trafficking, and/or possession of illegal drugs. I believe persons present at the time the warrant is served or persons who may arrive at the location mentioned in this affidavit during the service of the warrant may be sources of supply, customers and/or persons present or arriving to ingest illegal drugs. I request the order of the Court to authorize a search of the following: 1) Any and all persons present at the time the warrant is served; 2) Any and all persons who arrive during the service of the warrant; and, 3) Any and all vehicles under the control of persons present or that arrive during the service of the warrant.

55. Based on my training and experience I know that persons who use illegal drug can be unpredictable, combative and/or violent. Based on my training and experience I know that persons involved with large quantities of illegal drugs and currency often maintain weapons to protect their drugs and money. Based on my training and experience I know that persons involved with the use, purchase and/or sale of illegal drugs often retain evidence of drug trafficking on electronic devices such as cell phones and smart phones. I also know these electronic records are easily destroyed, as is physical drug evidence. Based on this and the above information and the inherent danger involved with serving drug related search warrants, I am requesting No Knock and Night Time service for the locations mentioned in this affidavit, as it may be necessary for the safety of law enforcement to serve the search warrant without announcing and under the cover of darkness. It may also be necessary for law enforcement to serve the search warrant without announcing to prevent the destruction of physical and/or electronic evidence.

56. Based on the above, I believe that there is probable cause to believe that evidence of violations of [REDACTED] exist at the property identified above and described in Attachment A.



Brandon Purcell, Special Agent
Drug Enforcement Administration

Sworn to and subscribed before me, telephonically, on the 15th day of June, 2021.



VERONICA DUFFY
UNITED STATES MAGISTRATE JUDGE